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| 11 | | |
| 12 | Attorneys for Plaintiffs UMG Recordings, Inc.; Capitol Records, LLC; Concord Bicycle Assets, LLC; CMGI Recorded Music Assets LLC; Sony Music Entertainment; and Arista | |
| 13 | Assets, LLC; CMGI Recorded Music Assets L. Music | LC; Sony Music Entertainment; and Arista |
| 14 | UNITED STATES DISTRICT COURT | |
| 15 | NORTHERN DISTRICT OF CALIFORNIA | |
| 16 | SAN FRANCISCO DIVISION | |
| 17 | | |
| 18 | UMG RECORDINGS, INC., CAPITOL | Case No.: 3:23-cv-06522-MMC |
| 19 | RECORDS, LLC, CONCORD BICYCLE | Case 110 5.25-ev-00322-111111C |
| 20 | ASSETS, LLC, CMGI RECORDED MUSIC ASSETS LLC, SONY MUSIC | Fourth Stipulation and Proposed Order to |
| 21 | ENTERTAINMENT, and ARISTA MUSIC | Extend Stay of Proceedings |
| 22 | Plaintiff(s), | |
| 23 | vs. | |
| 24 | INTERNET ARCHIVE, BREWSTER | |
| 25 | KAHLE, KAHLE/AUSTIN FOUNDATION, SECORGE BLOOD, and GEORGE BLOOD, | |
| 26 | L.P. | |
| 27 | Defendant(s). | |
| | | 1 |
| 28 | Fourth Stip. and Prop. Order | Case No.: 3:23-cv-06522-MMC |
| | To Ext. Stay of Proceedings | |

| 1 | Pursuant to Civil Local Rule 6-1(b) and Section 7 of the Court's Standing Orders, Plaintiff | | |
|----|---|--|--|
| 2 | UMG Recordings, Inc., Capitol Records, LLC, Concord Bicycle Assets, LLC, CMGI Recorded | | |
| 3 | Music Assets LLC, Sony Music Entertainment, and Arista Music (collectively, "Plaintiffs") and | | |
| 4 | Defendants Internet Archive, Brewster Kahle, the Kahle/Austin Foundation, George Blood, an | | |
| 5 | George Blood LP (collectively, "Defendants") (Plaintiffs and Defendants shall collectively b | | |
| 6 | referred to as the "Parties"), hereby stipulate as follows: | | |
| 7 | WHEREAS, on June 2, 2025, the Court granted the Parties' third stipulation to stay the | | |
| 8 | case for thirty (30) days, which is set to expire on July 7, 2025, ECF No. 172; | | |
| 9 | WHEREAS, the Parties are engaged in ongoing settlement discussions and believe that | | |
| 10 | extending the current stay for an additional thirty (30) days will facilitate resolution of this matter | | |
| 11 | without further involvement of the Court; | | |
| 12 | WHEREAS, in the event that settlement discussions do not result in a resolution, the Parties | | |
| 13 | agree to confer and submit a proposed schedule to the Court to reset case deadlines; | | |
| 14 | NOW, THEREFORE, the Parties hereby stipulate and respectfully request the Court to | | |
| 15 | order as follows: | | |
| 16 | 1. All proceedings and deadlines in this case shall be stayed through and including August | | |
| 17 | 6, 2025 to allow the Parties to continue their settlement discussions. | | |
| 18 | 2. If the settlement discussions result in a resolution, the Parties will promptly file an | | |
| 19 | appropriate dismissal with the Court. | | |
| 20 | 3. If the settlement discussions are not successful, the Parties shall meet and confer to | | |
| 21 | propose a new schedule for the case and submit a joint proposed scheduling order to | | |
| 22 | the Court within ten (10) days following the expiration of the stay. | | |
| 23 | IT IS SO STIPULATED. | | |
| 24 | Dated: July 3, 2025 | | |
| 25 | /s/ Matthew J. Oppenheim /s/ Andrew M. Gass | | |

/s/ Matthew J. Oppenheim/s/ Andrew M. GassMatthew J. Oppenheim (pro hac vice)Andrew M. Gass (Bar No. 259694)Corey Miller (pro hac vice)andrew.gass@lw.comDanae Tinelli (pro hac vice)Joseph R. Wetzel (Bar No. 238008)

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Fourth Stip. and Prop. Order To Ext. Stay of Proceedings

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| | Attorneys for Plaintiffs UMG Recordings, Inc. | |
| 15 | Capital Records, LLC; Concord Bicycle Asset | |
| 16 | LLC; CMGI Recorded Music Assets LLC; Son | iy |
| | Music Entertainment; and Arista Music | |
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| 28 | Fourth Stip. and Prop. Order | 3 Case No.: 3:23-cv-06522-MMC |
| | To Ext. Stay of Draggedings | Case 110 5.25-61-00522-111111C |

To Ext. Stay of Proceedings

SIGNATURE ATTESTATION

Pursuant to Civ. L.R. 5.1, I hereby attest that I have obtained the concurrence in the filing of this document from all the signatories for whom a signature is indicated by a "conformed" signature (/s/) within this e-filed document and I have on file records to support this concurrence for subsequent production for the Court if so ordered for inspection upon request.

Dated: July 3, 2025 OPPENHEIM + ZEBRAK, LLP /s/Matthew J. Oppenheim
Matthew J. Oppenheim

Fourth Stip. and Prop. Order To Ext. Stay of Proceedings

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION

| NORTHERN DISTR | ICI OF CALIFORNIA |
|---|--|
| SAN FRANC | ISCO DIVISION |
| UMG RECORDINGS, INC., CAPITOL RECORDS, LLC, CONCORD BICYCLE ASSETS, LLC, CMGI RECORDED MUSIC ASSETS LLC, SONY MUSIC ENTERTAINMENT, and ARISTA MUSIC | Case No.: 3:23-cv-06522-MMC [Proposed] Order to Extend Stay of Proceedings |
| Plaintiff(s), |)) |
| vs. | |
| INTERNET ARCHIVE, BREWSTER KAHLE, KAHLE/AUSTIN FOUNDATION, GEORGE BLOOD, and GEORGE BLOOD, L.P. | |
| Defendant(s). |)) |
| 2025 to allow the Parties to continue the 2. If the settlement discussions result in appropriate dismissal with the Court. 3. If the settlement discussions are not succe a new schedule for the case and submethin ten (10) days following the expirit IT IS SO ORDERED. | orn, hereby orders as follows: ase shall be stayed through and including August of the eir settlement discussions. In a resolution, the Parties will promptly file a cessful, the Parties shall meet and confer to proposition a joint proposed scheduling order to the Country of |
| Dated: | MAXINE M. CHESNEY United States District Judge |

Fourth Stip. and Prop. Order

To Ext. Stay of Proceedings

Case No.: 3:23-cv-06522-MMC